

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF PLAINTIFFS' REPLY IN
SUPPORT OF PLAINTIFFS' MOTION TO
EXCLUDE OPINIONS OF AKHILESH NAGAICH, PH.D.**

DANIEL A. NIGH, hereby certifies as follows:

1. I am an attorney at law within the State of Florida with Nigh Goldenberg Raso & Vaughn and serve as Court-appointed Plaintiffs' co-lead counsel to the Plaintiff's side. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' reply in support of Plaintiffs' motion to preclude opinions of defense expert Akhilesh Nagaich, PH.D.
 2. Attached hereto as **Exhibit 1** to the Motion is a true and accurate copy of the February 9, 2023 Transcript of the videotaped deposition of Akhilesh Nagaich, Ph. D.
 3. Attached hereto as **Exhibit 2** to the Motion is a true and accurate copy of the December 22, 2022 Expert Report of Akhilesh Nagaich, PH.d.
 4. Attached hereto as **Exhibit 3** to the Motion is a true and accurate copy of USP General Notices and Requirements.
 5. Attached hereto as **Exhibit 4** to the Motion is a true and accurate copy of
- TORRENT-MDL2875-00072542

6. Attached hereto as **Exhibit 5** to the Motion is a true and accurate copy of
TORRENT-MDL2875-00516411.

7. Attached hereto as **Exhibit 6** to the Motion is a true and accurate copy of the
October 31, 2022 Expert Report of Ramin (Ron) Najafi, Ph.D.

8. Attached hereto as **Exhibit 7** to the Motion is a true and accurate copy of the July
6, 2021 Expert Report of Stephen S. Hecht, Ph.D.

**NIGH GOLDENBERG RASO
& VAUGHN, PLLC**
Attorneys for Plaintiffs

Dated: April 25, 2023

By: /s/ Daniel A. Nigh
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